

MEMO ENDORSED

LAW OFFICES OF
JACQUELINE E. CISTARO

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/3/2024

325 Broadway · Suite 505 · New York, NY 10007 · 125 Half Mile Road · Suite 200 · Red Bank, NJ 07701
T: 646.253.0583 · F: 646.224.9618 · C: 732.642.0598 · E: JEC@cistarolawfirm.com
www.cistarolawfirm.com

August 30, 2024

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Christopher Reese, 24 Cr. 00402 (VEC)

Your Honor:

On or about July 11, 2024, the Court received a pro se motion to disqualify the Assistant United States Attorneys and to dismiss the indictment. Mr. Reese did not advise counsel that he intended to file the pro se motions. After conferring with Mr. Reese and the government, counsel respectfully requested additional time to review the discovery in order to determine whether it would be appropriate to adopt the defendant's motion.

After conferring with the government concerning the volume of discovery, counsel ordered two hard drives to be delivered to the government for copies of the discovery for counsel and the defendant. Counsel also advised Mr. Reese that it would likely take some time for the government to download the discovery as it was quite voluminous.

On August 21, 2024, counsel received an email and an initial production letter from the government advising that the hard drives were prepared and being mailed to counsel and the defendant for review. As expected by all parties, it took some time for the government to download and produce the hard drives.

Recently, I returned from out-of-state and learned that Mr. Reese filed an additional pro se motion, which I have reviewed but have not had the opportunity to discuss with the defendant. I will visit Mr. Reese over the weekend in accordance with the Court's memo endorsement. *Dkt.* 23.



————— LAW OFFICES OF —————
JACQUELINE E. CISTARO

325 Broadway · Suite 505 · New York, NY 10007 · 125 Half Mile Road · Suite 200 · Red Bank, NJ 07701
T: 646.253.0583 · F: 646.224.9618 · C: 732.642.0598 · E: JEC@cistarolawfirm.com
www.cistarolawfirm.com

Lastly, I apologize to the Court for failing to timely file counsel's position with respect to the defendant's pro se motions as I miscalendared the date ordered by the Court on July 18, 2024. *Dkt. 16*. I respectfully request a brief extension to address the defendant's previously filed pro se motions and newly filed motion to proceed pro se and disqualify the Assistant United States Attorneys. I respectfully request an extension to September 6, 2024. The government consents to this request.

I truly apologize for any inconvenience. Thank you for your time and consideration.

Respectfully submitted,

s/ Jacqueline E. Cistaro, Esq.

cc: All counsel

The deadline for Defendant's counsel to file a letter regarding Mr. Reese's motion to dismiss the indictment and to disqualify the Assistant United States Attorneys on this matter is hereby ADJOURNED to **September 12, 2024**. The letter must also indicate whether Mr. Reese wishes to proceed *pro se* regardless of who is appointed to represent him, or whether he wishes to proceed *pro se* only if Ms. Cistaro continues to represent him. Counsel for the Defendant must meet in-person with Mr. Reese to discuss these issues not later than **September 11, 2024**.

SO ORDERED.

9/3/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE